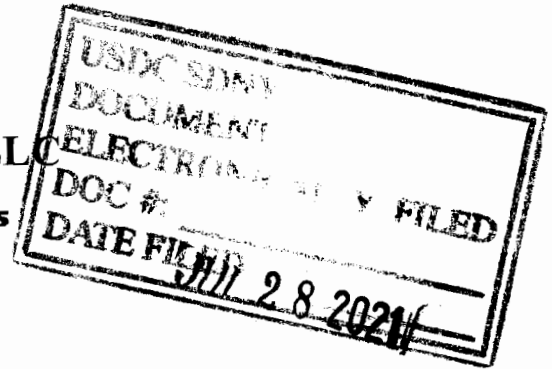


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July 27, 2021

Via ECF

Hon. George B. Daniels
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: JUL 28 2021

Re: United States v. Willie Evans, et al.
1:20 Cr. 0057 (GBD)

Dear Judge Daniels:

Undersigned counsel, together with Natali Todd, represent Mr. Willie Evans in the above-captioned matter. This letter is respectfully submitted to request an extension of the deadline by which to file motions, which is currently scheduled for August 2, 2021.

As the Court well understands, based on the number of defendants and the number of acts charged against these defendants, the discovery in this case has been voluminous. Attorney Todd and I are engaged in the review of this discovery and together with the defendant, we are attempting to determine the number and types of motions to be filed. We respectfully request an extension of 45 days or until September 16, 2021 to file pre-trial motions. The government's response to these motions would be extended to October 28, 2021, and any replies would be submitted by the undersigned by November 11, 2021. The undersigned has discussed this application for an extension of the motions filing date with AUSA Peter Davis who has indicated that the government does not object to this request.

I thank you for Your Honor's consideration.

Respectfully submitted,

Bruce D. Koffsky
Bruce D. Koffsky

BDK/me

cc: All Counsel of Record